



Office of
INSPECTOR GENERAL
U.S. Department of the Interior

Department of the Interior



Museum Collections: Accountability and Preservation



United States Department of the Interior

OFFICE OF INSPECTOR GENERAL
Washington, DC 20240

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Memorandum

To: Rhea Suh
Assistant Secretary for Policy, Management and Budget

Larry EchoHawk
Assistant Secretary for Indian Affairs

From: Mary L. Kendall *Mary L. Kendall*
Acting Inspector General

Subject: Final Audit Report, "Department of the Interior Accountability and Preservation of Museum Collections" (Report No. C-IN-MOA-0010-2008)

This memorandum transmits the consolidated results of our assessment of the Department of the Interior's (DOI) stewardship over museum collections. Our assessment included an audit of DOI's accountability over museum collections and an evaluation of DOI's preservation of those collections.

Our audit found that DOI is failing to fulfill its stewardship responsibilities over museum collections. Specifically, we found a widespread failure to properly accession, catalog, or inventory museum collections. At DOI facilities, elements of the Nation's heritage are being neglected and forgotten in thousands of boxes that contain millions of objects neither identified nor accounted for. Additionally, DOI has little idea of what museum collections non-DOI facilities hold.

Our report includes 10 recommendations related to accountability over museum collections. Based on management's response to our draft report, we consider:

- Recommendations 6 and 10 resolved but not implemented.
- Recommendations 1 and 4 unresolved because management did not agree with the original recommendations. Based on the concerns expressed, we revised these recommendations.
- Recommendations 3, 5, 7, 8, and 9 unresolved. While management generally agreed with the recommendations, additional information is needed before we can consider the recommendations resolved. Appendix H to the report describes the additional

information needed.

- Recommendation 2 unresolved. We added this recommendation after reviewing management's response to the draft report.

At the conclusion of our audit, we conducted a brief evaluation of DOI's preservation practices over its museum collections. We found that DOI needs to take additional steps to improve preservation practices over its museum collections. Because the preservation of the collections at many DOI sites has been neglected, countless artwork, artifacts, and other museum objects are in jeopardy. Based on the evaluation work, we added three additional recommendations (Recommendations 11, 12, and 13) to this report.

Please provide us a response to the report by January 15, 2010. The response should provide information on actions taken or planned to address our findings and recommendations, target dates and titles of the officials responsible for implementation. Please address your responses to:

Ms. Kimberly Elmore
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The legislation, as amended, creating the Office of Inspector General requires that we report to the Congress semiannually on all reports issued, actions taken to implement our recommendations, and recommendations that have not been implemented.

If you have any comments or questions regarding this report, please call me at (202) 208-5745.

EXECUTIVE SUMMARY

The Department of the Interior (DOI or Department) is failing to fulfill its stewardship responsibilities over museum collections second in size only to the Smithsonian Institution. The Department manages collections that are estimated to include over 146 million items of artwork, artifacts, and other museum objects at 625 Department facilities and at least 1,020 non-DOI facilities.

We found widespread failure to properly execute the three key processes required to maintain accountability over museum collections – accessioning, cataloging, and inventorying. At DOI facilities, elements of the Nation’s heritage are being neglected and forgotten in thousands of boxes containing millions of objects neither identified nor accounted for. As a result, these collections are unavailable for research, education, or display and are subject to theft, deterioration, and damage. The Department has little idea what museum collections non-DOI facilities hold. We found that the Department did not have inventory listings of the collections held by outside facilities and did not conduct the required annual physical inventories. Four bureaus admitted they do not even know all facilities that hold their museum collections.

These widespread accountability issues are largely due to poor program management, ineffective oversight, poor reporting, and an insufficient allocation of resources. Many of these problems have been documented as far back as 1990 when we issued our audit report “Accountability and Control over Artwork and Artifacts” (Report No. 90-83). In 1993, DOI identified lack of accountability and control of museum property as one of its four most critical material weaknesses. To address this weakness, DOI developed Department-wide standards for managing museum collections; unfortunately, bureaus are simply not following that guidance. Establishing accountability over these museum collections has not been a priority for the Department.

In its response to our draft report, the Department agreed that it needs to improve the management of its museum collections and that there are opportunities to enhance the processes for identifying and tracking museum collections. The Department took exception, however, to how we characterized the overall state of its museum programs, stating that it had made significant progress in museum stewardship since 1990. The Department attributed the issues we identified primarily to the lack of funding and staff. While we acknowledge that progress has been made, we remain concerned about the lack of accountability for the Department’s museum collections. The Department estimates that full cataloging of its collections will not be completed for at least another 20 years - well after 2030. To effectively address these issues, the Department’s bureaus will need to identify and allocate the appropriate resources.

At the conclusion of our audit, we conducted a brief evaluation of the Department’s preservation practices over its museum collections. We found that the Department needs to take additional steps to improve preservation practices over its museum collections. Because the preservation of the collections at many DOI sites has been neglected, countless artwork, artifacts, and other museum objects are in jeopardy.

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WHY WE DID THIS AUDIT AND EVALUATION

Our July 2008 report, “History Collection in Jeopardy at Harpers Ferry Center” (Y-EV-NPS-0004-2008), describes long-standing problems of accountability of the artifacts under the Center’s care. These problems endangered important artifacts such as Ansel Adams photographs; records and journals of Civil War General, Abner Doubleday; and the first National Park Service (NPS) uniforms. The report noted that documentation of the collection at the Center was lacking for years, with one NPS museum registrar stating, “It’s hard to come up with recommendations for collections management when you don’t even know what you have or where it’s located.” We wanted to determine if the accountability problem identified at Harper’s Ferry was an isolated incident or part of a systemic problem.

BACKGROUND

The Department manages museum collections second in size only to the collections held by the Smithsonian Institution. These collections provide a link to our cultural and natural heritage and serve as a fundamental resource for research into our national environment, history, and culture.

Ten categories of museum collections exist. The largest, documents (60 percent) and archeological objects (35 percent), make up approximately 95 percent of the total. Other categories of collections include art, ethnography, history, paleontology, geology, botany, zoology, and environmental samples (see Figure 1).

DOI’s Office of Acquisition and Property Management (PAM) oversees the Museum Program. Like many DOI programs, however, the

Archeological Objects,

a category of museum property that includes items that come from archeological research on Federal or tribal lands.



Photo by NPS



Photo by NPS



Photo by NPS



management of museum collections is largely delegated to the individual bureaus. The National Park Service (NPS) holds the largest collections. The Bureau of Land Management (BLM), Bureau of Reclamation (BOR), Bureau of Indian Affairs (BIA), and Fish and Wildlife Service (FWS), maintain smaller collections (see Figure 2). Collections at other bureaus and Departmental offices represent less than 1 percent of the Department's overall collections.

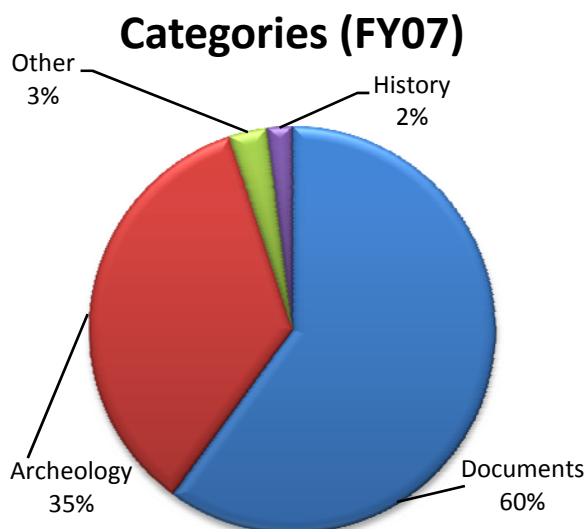


Figure 1

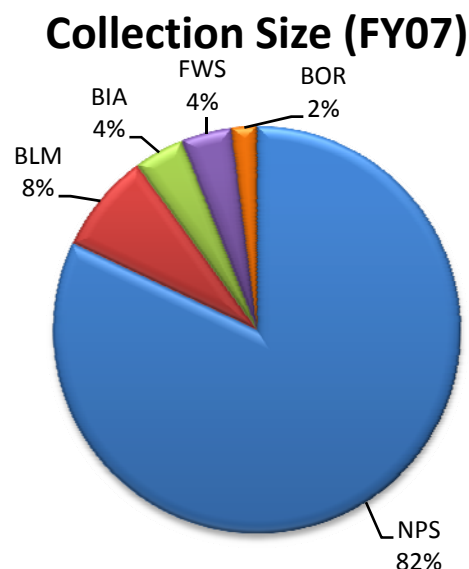


Figure 2

According to DOI's Museum Property Handbook, museum property maintained by a Departmental unit, such as a national park or wildlife refuge, should directly relate to the mission or programs of its associated bureau. By law, however, bureaus may also be responsible to maintain other, unrelated types of property. For example, bureaus must maintain any archeological collections recovered from federal lands. Each Departmental unit that maintains a museum collection must have a written scope of collection statement. The scope defines the purpose of the unit's museum collection and states what types of property may be acquired for that purpose. Museum property may be acquired through five types of transactions — donation, purchase, exchange, transfer, and field collection.

A large number of non-DOI facilities hold DOI museum collections under the provisions of the "Antiquities Act of 1906," which allows reputable organizations, such as museums and universities, to obtain permits to examine, excavate, and gather objects of antiquity on federal lands. However, under the "Archaeological Resources Protection Act of 1979," archeological resources found on lands owned or controlled by the U.S. Government remain federal property. Additionally, non-DOI facilities hold DOI-owned collections for research, storage, display, or a variety of other reasons.

DETAILS OF AUDIT

We visited 28 DOI and 3 non-DOI sites from August 2008 through December 2008 to review their accountability over Museum Collections. Our audit included BLM, BOR, BIA, FWS, and NPS sites. Our objectives were to determine if DOI knew what artwork, artifacts, and other museum objects it owns and where those objects were located. Appendix A describes our audit scope and methodology and Appendix C lists the sites we visited.

We identified a lack of accountability over museum collections. DOI has jeopardized countless works of art, artifacts, and other museum objects by failing to keep track of its vast museum collections. At DOI facilities, important elements of the Nation's heritage sit in boxes, neglected or forgotten. At non-DOI facilities, DOI does not know what objects these facilities hold and cannot even identify all non-DOI facilities that have its collections. The results of our audit are chronicled below.

ACCOUNTABILITY OVER MUSEUM COLLECTIONS

DOI is failing to track museum collections held in its facilities.

Three key processes are vital in identifying and tracking museum collections:

- Accessioning: Documenting legal custody, ownership, and how the objects were acquired.
- Cataloging: Recording detailed information about individual objects or groups of related objects. Catalog records identify objects in possession, their condition, and their location.
- Inventorying: Checking the existence and physical location of the objects and the accuracy of recorded catalog record information.

Accessioning

Works of art, artifacts, and other museum objects enter DOI's collections through accessioning. Before accepting an object, staff members must first determine that it fits within their unit's scope of collection and that a basis for establishing legal title exists. Once an object or group of objects has been accepted, it must be accessioned and recorded in an accession book (either electronic or hard copy). Each accession transaction should be logged sequentially into the accession book, which captures key information including description, condition, and method of acquirement.

One accession transaction might relate to a group of objects received from a single source. For example, a single accession may reflect a significant number of objects obtained from a field collection or archeological dig.

Documents,

a category of museum property that includes documentation providing evidence of events, persons, or resources associated with a unit such as photos, maps, etc.



NPS Photo of Ruth Coyote



Original leather-bound Indian accounting ledger
Photo by Office of Special Trustee for American Indians



Map of the Louisiana Purchase
Photo by Archiving Early America

Accessioning is the first step toward establishing legal title and accountability over objects and should be completed in a timely manner. We found, however, that of the 28 sites we visited, nine were not accessioning objects upon receipt. In fact, three of these sites were not accessioning at all.¹ Five of the nine sites² had significant accession backlogs. For example:

- BOR - New Melones Artifact Storage Facility in Jamestown, CA: Only about 24,000 of its estimated 418,000 objects had been accessioned.
- NPS - Golden Gate National Recreation Area in San Francisco, CA: We were told that it takes from 1 to 6 months to accession an object once a decision has been made to do so. However, we discovered approximately 500 archeological objects for which no decision had yet been made. Golden Gate has had some of these objects for 30 years.
- BLM - Billings Curation Center in Billings, MT: The Center had 534 boxes of unaccessioned objects. We were told that some of the objects date back to the mid 1980s. Subsequent to our visit, the Center has taken steps to initiate accessioning of the 534 boxes.

In order to determine what objects should be accessioned, each unit that maintains a museum collection should have a written scope of collection. Absent a written scope of collection, unit staff members may waste time and resources accepting, documenting, and maintaining objects that should never have been included in their collections.

¹ These three sites were: BIA Rocky Mountain Regional Office in Billings, MT; BIA Western Regional Office in Phoenix, AZ; and FWS Portland Regional Office in Sherwood, OR

² These five sites were: BLM Billings Curation Center in Billings, MT; BOR New Melones Artifact Storage Facility in Jamestown, CA; NPS Golden Gate National Recreation Area in San Francisco, CA; NPS Southern Florida Collections Management Center in Homestead, FL; and FWS Kenai National Wildlife Refuge in Soldotna, AK. The remaining site that was not accessioning objects upon receipt was NPS Boston National Historical Park in Boston, MA. However there were only approximately 100 objects not accessioned.

The Departmental Manual requires units to review their scopes of collections at least every 5 years. However, we found that 12 of the 28 DOI sites operated either without a scope of collection or with an outdated scope. Specifically:

- Two BIA sites and one NPS site (see Appendix E) did not have written scopes of collections.
- Four NPS, one BOR, one BLM, and two FWS sites (see Appendix E) had not reviewed their scopes of collection for over 5 years. Boston National Historical Park's scope of collection dated back to the 1980s. Golden Gate National Recreation Area in San Francisco, CA and Anasazi Heritage Center in Dolores, CO were in the process of updating their documents.
- One BOR site, New Melones Artifact Storage Facility in Jamestown CA, is using an Agency-wide scope of collection instead of a unit-specific scope.

In the absence of a good accessioning process, bureaus may accept objects for which legal title has not been sufficiently established, and bureaus risk losing information and documentation related to the objects being accessioned, making it difficult to accurately describe the object and its source. Objects that have not been accessioned also have a greater risk of loss or theft.

Cataloging

For FY 2007, DOI reported that out of a total collection size of approximately 146 million objects, 78 million objects (53 percent) were not cataloged. We found that large cataloging backlogs are common to most of the bureaus. NPS, however, stood out with an estimated 60 million uncataloged objects or 78 percent of DOI's 2007 total. Of the 9 NPS sites we visited, 6 had backlogs of over 400,000 objects.³ The backlog at Golden Gate National Recreation Area in San Francisco, CA was over 3 million objects, while the backlogs at Acadia National Park in Bar Harbor, ME



Many DOI museum objects are merely boxed and stored out of sight.

and the Alaska Region Curatorial Center in Anchorage, AK were around 1 million objects each. In some cases, objects remained uncataloged for decades. For example, Acadia and the South Florida Collections Management Center in Homestead, FL had uncataloged objects dating back to the 1940s.

As a result of the cataloging backlogs, millions of objects remain boxed — unknown and unaccounted for. These objects are, for the most part, unavailable for research, education, or display and are susceptible to theft, deterioration, and damage.

³ These sites include: Alaska Regional Curatorial Center in Anchorage, AK; Golden Gate National Recreation Area in San Francisco, CA; Southern Florida Collections Management Center in Homestead, FL; Boston National Historical Park in Boston, MA; Acadia National Park in Bar Harbor, ME; and Fort Vancouver National Historical Site in Vancouver, WA.

Inventorying

All DOI units with museum collections are required to conduct annual physical inventories to verify the existence of the objects in their collections. Physical inventories help identify and correct accountability problems and are the first line of defense for identifying lost or stolen objects. In general, units are required to conduct physical inventories of random samples of cataloged objects and accessions.⁴ For sampled objects, the unit verifies 1) object existence, location, and condition, 2) catalog and/or accession records existence, accuracy, completeness, and 3) appropriate catalog and/or accession number markings.



This facility shows what objects are being stored. What may be unknown is where the objects came from and their significance. Proper accessioning, cataloging, and inventorying can resolve these issues.

In general, NPS and BOR staff complied with annual inventory requirements at the sites we visited. We found, however, widespread failure to conduct inventories at BIA, BLM, and FWS.

- BIA: Staff at five⁵ of seven sites we visited with museum property, failed to conduct annual inventories of their collections. In fact, staff at all five sites were unable to provide a current inventory listing of the objects in their collections. The listings we received were up to 5 years old and had not been updated.
- An Indian Affairs official informed us that bureau sites are responsible for maintaining the inventory of museum collections at their sites. Site officials indicated, however, that accountability for museum collections had been transferred years ago to BIA's Division of Environmental and Cultural Resource Management (DECRM). They indicated that DECRM staff neither conduct the annual physical inventories nor request that site officials conduct them. Therefore, no one has performed these inventories in years.
- BLM: The Billings Curation Center in Billings, MT does not conduct the required annual physical inventories due to insufficient staffing. Site management indicated that objects are typically checked only when they are retrieved from storage for researchers and because collections are maintained in a secure area, the risk of loss is low.

⁴ Whenever the number of cataloged objects or accessions is less than 250 objects, the unit must conduct a 100 percent physical inventory. Units must also conduct a 100 percent inventory of "controlled museum property," which represents property that is either highly valuable or especially vulnerable to theft, loss, and damage.

⁵ These five locations were: Alaska Native Claims Settlement Act Office in Anchorage, AK; Western Regional Office in Phoenix, AZ; Sherman Indian School Museum in Riverside, CA; Southern California Agency Office in Riverside, CA; and Rocky Mountain Regional Office in Billings, MT.

- FWS: All three⁶ of the sites we visited with museum property did not perform annual physical inventories in compliance with Department policy. At Kenai National Wildlife Refuge in Soldotna, AK, staff said that a physical inventory has never been conducted. At the Portland Regional Office located in Sherwood, OR, staff maintained no inventory listing at all.

We also found that systems problems hamper the bureaus' ability to maintain inventory listings and conduct their annual physical inventories. Although DOI issued a requirement that all bureaus begin using one standard system, the Interior Collections Management System (ICMS), by September 30, 2009, no standard system is currently in place for tracking museum collections. Instead, DOI uses a patchwork of systems.

BIA has a unique inventory systems problem. Access to its Automated National Catalog System Plus was shut off years ago due to a court ruling and performance problems. Although BIA officials told us that they are now allowed access, the sites still do not have access to the system. However, an official informed us that in FY 2009, BIA staff initiated reestablishing access to the system. They have performed system testing and security verification. The official stated that they have begun training on the system and should complete full implementation, including updates to the existing records by the end of the fiscal year. However, this had only been partially completed.

Using a standardized system should improve DOI accountability over its museum collections. However, one FWS official stated that ICMS will really only provide uniform information for those collections that have been cataloged and inventoried to an extent that makes their entry into ICMS

Other

museum property categories include:

Ethnography – Objects associated with cultural or traditional life ways of Native Americans or other indigenous groups



Photo by NPS

Biological – Specimens are collected from geographical areas for study.



Photo by OIG

Paleontology – Fossil items.



Photo by the University of Colorado
Museum of Natural History

⁶ These three sites were: Kenai National Wildlife Refuge in Soldotna, AK; Portland Regional Office in Sherwood, OR; and D.C. Booth Historic National Fish Hatchery in Spearfish, SD.

possible. “For the lion’s share of materials that bureaus count as museum property only a small percentage may be in a state that lends itself to inclusion within ICMS. It will note the bureau backlog, but not much else for unidentified collections,” the FWS official said.

Failure to conduct annual inventories or do so improperly places collections at risk. The absence of good inventory controls increases the risk that objects could be lost or stolen. A recent OIG investigation of a suspected art theft at DOI’s National Business Center illustrates this difficulty. The manager who requested investigative assistance was unable to confidently claim that six paintings were ever in NBC’s possession and, thus, could not prove that they were stolen — as opposed to being lost or misplaced. A 100 percent inventory would have been necessary to determine whether the paintings were truly missing. In fact, during the course of the investigation, several of the paintings thought to be missing were found. The investigators concluded that the paintings could not be found due to a breakdown in the property accounting system rather than to criminal activity.

In another example, 530 items were identified as missing at the Western Archaeological and Conservation Center (the Center) in Tucson, AZ. These items included 500 documents missing since a move to a new building 5 years ago and 30 objects, such as bowls and a basket, that have been missing since the late 1980s. Although these items have been identified as missing, the Center has not deleted them from the inventory listings or reported them to law enforcement as lost or stolen. The staff at the Center stated that they kept the items on the inventory listing because in the absence of a 100 percent inventory, they cannot be sure that the items have been actually lost or stolen.

DOI is failing to track museum collections held by others.

We found that DOI did not adequately track collections held by non-DOI facilities, and in most cases, had little idea what objects those facilities held. BIA, BLM, FWS, and NPS did not even have complete lists of all non-DOI facilities that held their museum collections. For example, “BLM’s FY2007 Museum Collections Management Annual Summary Report” identified 79 facilities, including 2 in Canada and 1 in Denmark, which potentially held BLM collections. In these cases, BLM suspected, but had not yet confirmed, that these facilities actually held BLM collections.

Where non-DOI facilities were identified, BIA and FWS did not have any inventory listings of the objects held by those facilities and did not conduct any of the required annual physical inventories. BLM stated that as of 2008, it had inventory listings for 74 of the 136 known non-DOI facilities, representing approximately 35 percent of its total collections at non-DOI facilities.

While numerous challenges contribute to problems in managing museum collections stored at non-DOI facilities (see appendix F), we found that BIA and BLM were not even communicating with the non-DOI facilities that they knew housed their museum collections. We visited three non-DOI facilities that were identified as having DOI property. The Department did not have an inventory of what these non-DOI facilities held. The facilities, however, were able to provide us with inventory listings of DOI’s objects that they held.

PROGRAM MANAGEMENT

The Department's Museum Program lacks the structure and support necessary to be an effective steward over the Nation's museum collections. The widespread accountability issues we found result from poor program management, ineffective oversight, poor management reports, and insufficient allocation of resources.

Program Management and Oversight

Management of the museum programs has been a longstanding issue dating back to at least 1990 when we reported that bureaus did not always perform physical inventories; reconcile inventory results with property records; and investigate missing, stolen, damaged, or destroyed property. At that time, the Department did not have detailed procedures for accessioning and cataloging property. As a result, the Department identified lack of accountability and control of museum property as one of the four most critical material weaknesses it faced in 1993. The Department also developed high level standards and requirements for managing museum collections⁷, applicable to all bureaus that had museum collections, as well as more detailed procedures contained in the "Museum Property Handbook." The bureaus, however, are not required to comply with the Handbook procedures. As a result, there is vast inconsistency in the procedures used at the 625 DOI facilities that house museum collections.

While there is ample guidance on museum collections management, neither PAM nor bureau managers have acted to ensure the bureaus comply with such guidance. Inadequate oversight has contributed to the lack of accountability over museum collections. Furthermore, employees at many sites told us that they believe their managers do not consider the administration of museum collections to be a high priority.

At BIA, responsibility for museum collections is most unclear. Although one Indian Affairs official stated that property staff at individual sites were responsible for the day-to-day inventory of their sites' museum collections, property staff told us they had no responsibility for the museum property because custody and control of the program was transferred to Division of Environmental and Cultural Resource Management (DECRM) in 1999 or 2000. The Director of Field Property Operations at one site told us that they were told not to worry about the museum property, that it was no longer their responsibility. Previously, he had maintained inventory listings and conducted physical inventories. DECRM did not continue these practices. BIA acknowledged this disconnect and stated that it will assess the museum collection management process and determine the appropriate roles and responsibilities.

⁷ The current standards are now documented in 411 DM issued by the Office of Acquisition and Property Management (PAM). 411 DM defines the roles and responsibilities for the museum program. It also provides the Departmental standards for documenting museum collections, including standards for accessioning, cataloging, inventorying, and reporting on museum collections.

Poor Management Reports

Each bureau prepares an annual summary report of its museum collections management, which PAM consolidates into a DOI-wide management summary report. Unfortunately, we found that the bureau reports, and, consequently, the DOI-wide report, are often inaccurate. For example:

- BOR: A data report used to prepare the summary report estimated a backlog of approximately 394,000 objects at the New Melones Artifact Storage Facility in Jamestown, CA. The curator, however, told us that the actual backlog could exceed 1.3 million objects.
- NPS: The Collection Management Report estimates the backlog at Lewis and Clark National Historic Park in Astoria, OR, to be about 44,000 objects, whereas the actual number, per the curator, was about 9,000.
- BLM: The Billings Curation Center located in Billings, MT, did not estimate or report any backlog estimates in BLM's annual report. The curator told us that only cataloged objects are included in the report. Therefore, BLM's annual summary report understates the number of objects held by the Center.
- BIA's summary report indicated that the Area Archeology Field Office in Anchorage, AK, had 5,000 museum objects that had not been cataloged. We found that the office had no museum property at all. Field office officials told us that they did not understand why their office had been included in the annual summary report at all given that it does not have any museum property.

Resources

All bureaus cited the lack of both funding and qualified staff as the reason for their accession and catalog backlogs and their failure to conduct inventories. These resource issues have been universally cited in the bureau-level and Department-wide "Museum Property Management Summary Reports" for the last few years. While "lack of resources" is a common lament of program managers, the extremely low staffing levels for the museum programs make it difficult for bureaus to establish accountability over their museum collections. For example:

- BIA has one curator for the entire bureau. She is responsible only for curating objects at the Central Region Office in Washington, DC. Any museum property work done at other BIA sites is done by staff with other responsibilities. One BIA official said that "limited staff and funding contribute to the lack of significant progress in improving property accountability."
- BLM staff consisted of only four full-time curators for the entire bureau in 2007. Additional staff of 25 professionals, such as archeologists and paleontologists, helped with the museum program in a limited capacity.

"A lack of trained staff to manage BIA museum property collections at field locations continues to be a significant issue . . ."
BIA Official

- FWS and NPS staff perform the majority of museum property management responsibilities as collateral duties. FWS officials stated that the Service “simply lacks the staff, time, and funding to adequately respond to many of its conservation, cataloging, and curation issues.” NPS officials stated that staff “often has only a small percentage of time devoted to museum management with no technical oversight by a professional level curator.”

Bureau staff at nearly every location told us that they have too few people with the appropriate qualifications to manage their museum collections. At many sites, we were told that 1) bureau managers do not consider museum collections administration to be important, 2) training is inadequate, and 3) backlogs are primarily caused by lack of funding.



Millions of objects throughout the Department remain uncataloged due to a lack of funding and manpower to do the job.

BEST PRACTICES

Although we found widespread accountability problems in DOI’s management of its museum program, we also found several best practices at individual sites.

Partnerships

We found that four sites⁸ we visited had developed partnerships with the public, colleges, and/or universities. For example, the Western Archaeological and Conservation Center located in Tucson, AZ, had a partnership to use graduate students to help catalog items. Fort Union Trading Post National Historic Site located in Williston, ND, also used volunteers to catalog items. These partnerships have aided DOI in managing museum collections.



Volunteers like the two shown here are of great service to DOI and the Nation. Many have accessioned, cataloged, and inventoried artworks, artifacts, and other museum objects to help clear backlogs.

Consolidation of Facilities

The Department reports that museum collections are held at 625 DOI sites. Each site is required to maintain the collections in accordance with departmental guidance. Some bureaus have

⁸ These four locations are: Western Archaeological and Conservation Center in Tucson, AZ; Billings Curation Center in Billings, MT; Fort Union Trading Post National Historic Site in Williston, ND; and, D.C. Booth Historic National Fish Hatchery in Spearfish, SD.

taken steps to consolidate collections from multiple sites into larger centers in order to comply with this requirement. Such consolidation utilizes minimal staff more efficiently. For example, NPS consolidated the collections from five of its parks in South Florida into one curation facility. NPS cited the following benefits of this consolidation:

- Efficient use of resources.
- Better ability to attract resources, grants, and partnerships than individual parks.
- Ability to attract and retain professional staff and consistently meet professional standards.

Site Procedures Manual and Team

Staff of the Fort Union Trading Post National Historic Site in Williston, ND developed a detailed site procedures manual that provides step-by-step instructions for cataloging its objects. The manual also describes a “team cataloging” process that functions much as an assembly line does. Each team member performs discrete duties associated with cataloging a series of artifacts. Using this process, Fort Union staff have been able to catalog 61,872 objects, or 21 percent of its backlog, during FY 2008.

MANAGEMENT VIEWS

In its response to our draft audit report, the Department agreed that it needs to improve the management of its museum collections. Specifically, it agreed that there were opportunities to enhance the accessioning, cataloging, and inventorying processes that are vital in identifying and tracking bureau museum collections.

Although the Department agreed with the need for improvements, it took exception to how we described the current state of the museum program. Specifically, the Department stated that our report did not capture the significant accomplishments that have occurred since our previous Department-wide audit of artwork and artifacts in 1990⁹. Accomplishments included the development of museum collection guidance for the bureaus in the form of 411 DM and the associated Museum Property Handbook. Additionally, the Department cited numerous initiatives to track and monitor implementation including completion of annual museum summary reports, completion of two targeted management control reviews of museum property collections, and development of the ICMS.

After evaluating the Department's response, we stand by our conclusions on DOI's museum program. Although nearly 20 years have passed since our previous audit, we still find widespread issues with the accessioning, cataloging, and inventorying of museum collections. We agree that the Department has issued ample guidance concerning the proper management of museum collections. The bureaus, however, are simply not following that guidance as evidenced by over 50 percent of museum objects not yet being cataloged and the numerous sites we visited that failed to conduct required annual inventories. The Department estimates that full cataloging of its collections will not be completed for at least another 20 years - well after 2030.

The Department's response reiterated the lack of funding and qualified staff that we discussed in our report and stated that our recommendations, to be effective, must address these shortfalls. We do not explicitly include a recommendation to adequately fund the museum programs. We do recommend, however, that the Department develop and implement a plan to eliminate the accessioning and cataloging backlogs. Inherent in that process is identifying and allocating the appropriate resources to implement the plan.

The Department's response addressed each of our recommendations and included additional comments on the report. We evaluated all of the Department's comments and made revisions to the report as we considered necessary. Appendix G summarizes our analysis of the Department's comments on our recommendations as well as some of the more significant comments and how we addressed them.

⁹ Accountability and Control Over Artwork and Artifacts – Department of the Interior (Report No. 90-83, July 1990)

EVALUATION OF PRESERVATION PRACTICES OVER MUSEUM COLLECTION

At the conclusion of our audit, we conducted a brief evaluation to determine the adequacy of the Department's preservation practices over its museum collections. *Appendix A* describes the scope and methodology of this evaluation. Choosing from the Department's comprehensive checklist of preservation practices designed to help bureaus evaluate how successfully they are preserving and protecting museum property in their custody,¹⁰ we selected 44 significant elements from seven major preservation categories to evaluate at selected sites. Our evaluation checklist is provided in *Appendix I*.

RESULTS OF EVALUATION

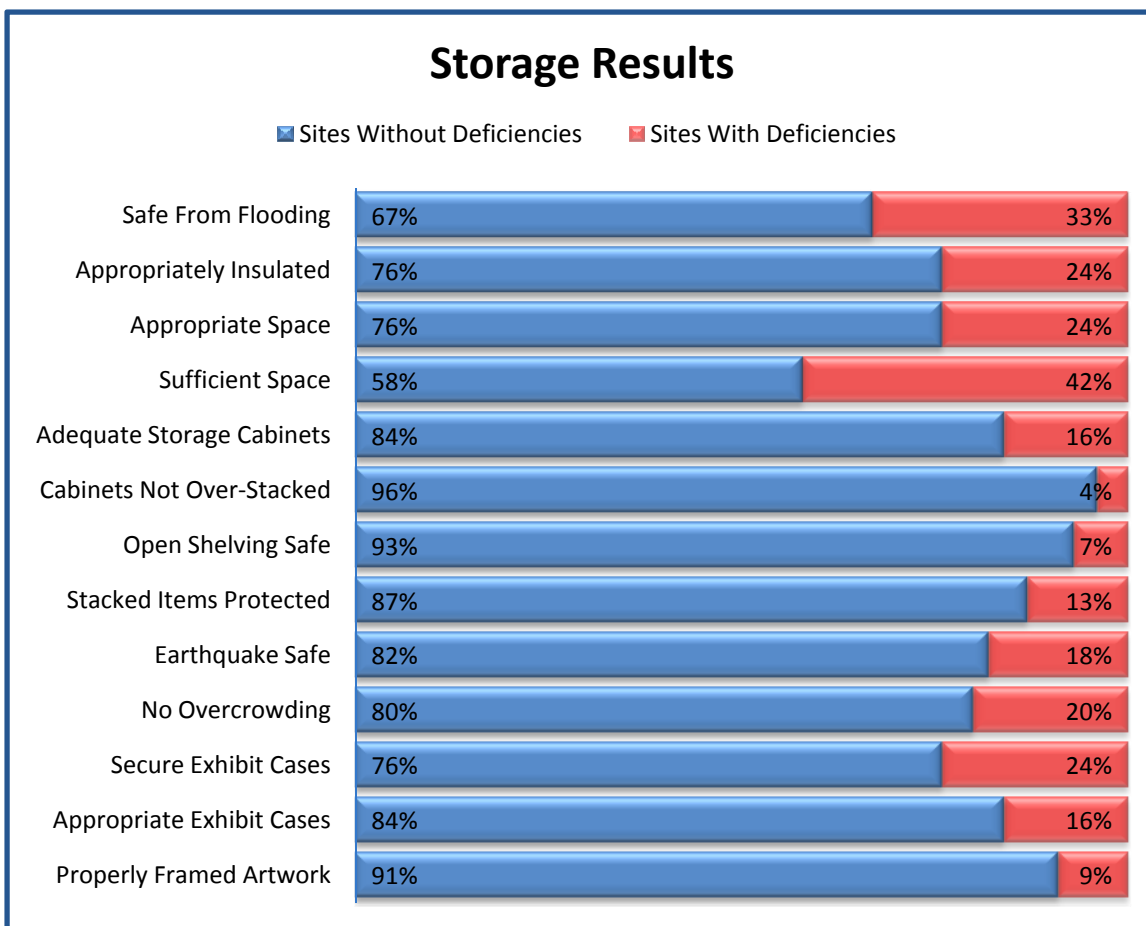
We found the Department could take additional steps to improve preservation of its museum collections. Preservation of the collections at many DOI sites has been neglected and countless artwork, artifacts, and other museum objects are in jeopardy. While some sites had only a small number of preservation practices they were not performing (four sites had just one deficiency each), others had numerous preservation practices they were not performing (four sites were not performing more than half of the preservation practices). Separate reports are being sent to each bureau providing detail of our preservation findings at their sites.

PRESERVATION CATEGORIES

The Department's Museum Property Handbook defines seven preservation categories: storage, environment, security, fire protection, housekeeping, planning, and staffing.

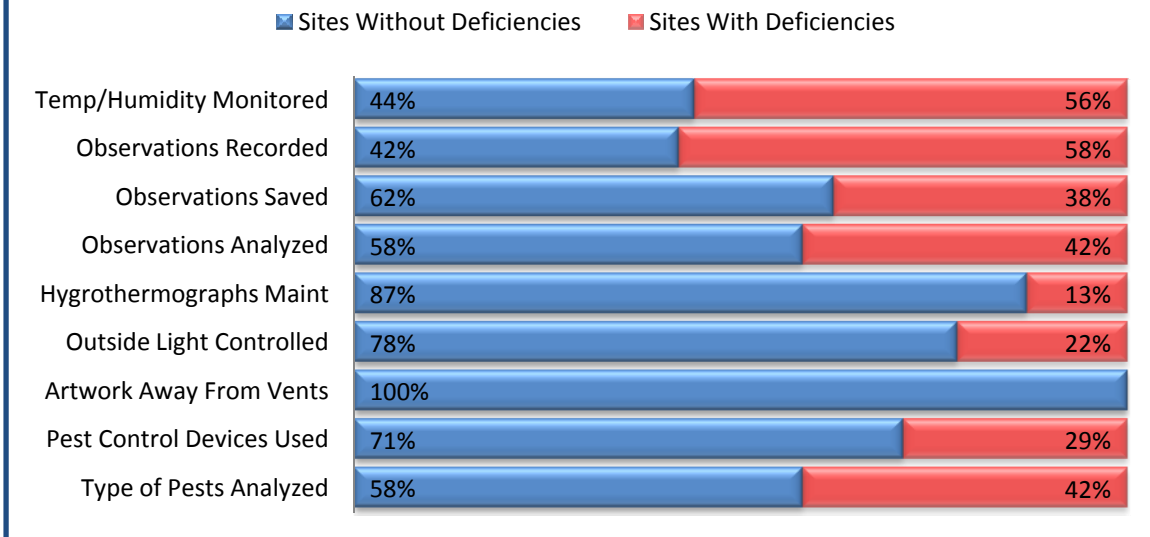
Storage. In order to ensure that museum collections are properly preserved, it is important that they be provided with safe and secure storage. This includes providing sufficient dedicated space and, to the extent possible, providing space that is separated from all other uses. The space must be adequate to accommodate the particular characteristics and quantity of objects, specimens, and archival items in the collection. To assess the adequacy of museum collection storage, we evaluated 13 critical requirements for proper storage. The following is a break out of the results.

¹⁰ The Departmental Manual Part 411, Museum Property Handbook, Volume 1, Appendix E, provides a comprehensive checklist for the preservation, protection, and documentation of museum property.



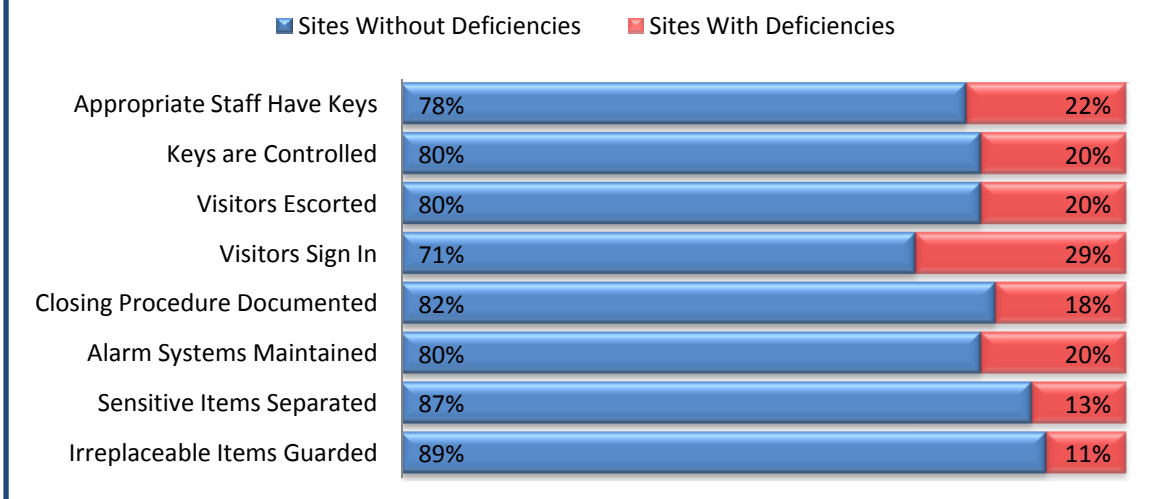
Environment. Changes in temperature and humidity, and exposure to light, dust, and pollution cause detrimental chemical and physical reactions in objects. Because deterioration of objects results from adverse environmental conditions, monitoring and controlling the environment are key factors to ensure the long-term preservation of museum property. To assess the adequacy of environmental controls over museum collections, we evaluated 9 critical requirements for proper environmental controls. The following is a break out of the results.

Environment Results

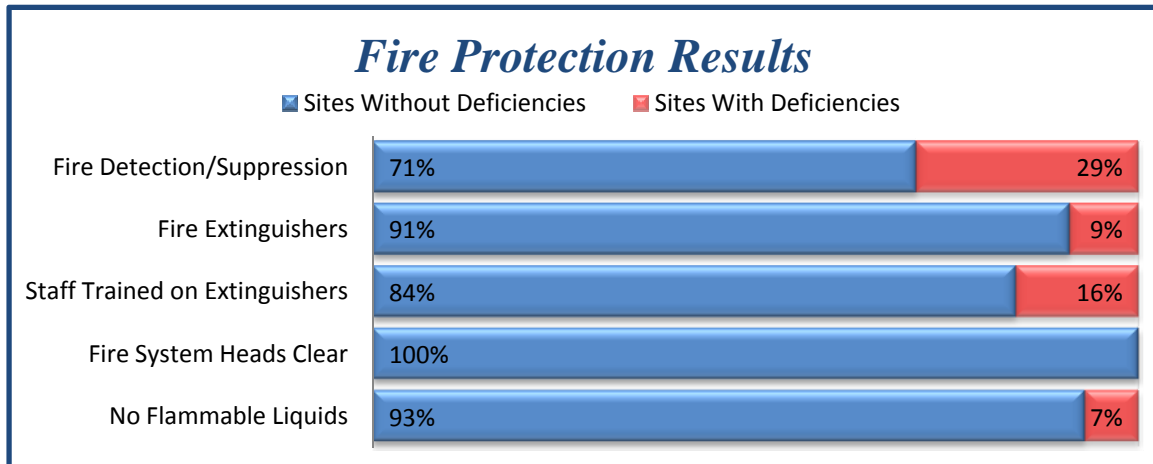


Security. Whether museum property is in storage, in transit, on exhibit, or in an office, protecting it against theft or other loss is paramount. The primary objectives of museum property security are to: (1) provide for the protection and safety of staff and visitors, (2) prevent the loss of museum property from all recognized threats, and (3) protect the documentation (e.g., accession records, catalog records, and field data) on museum property. To assess the adequacy of security over museum collections, we evaluated 8 critical requirements for proper security. The following is a break out of the results.

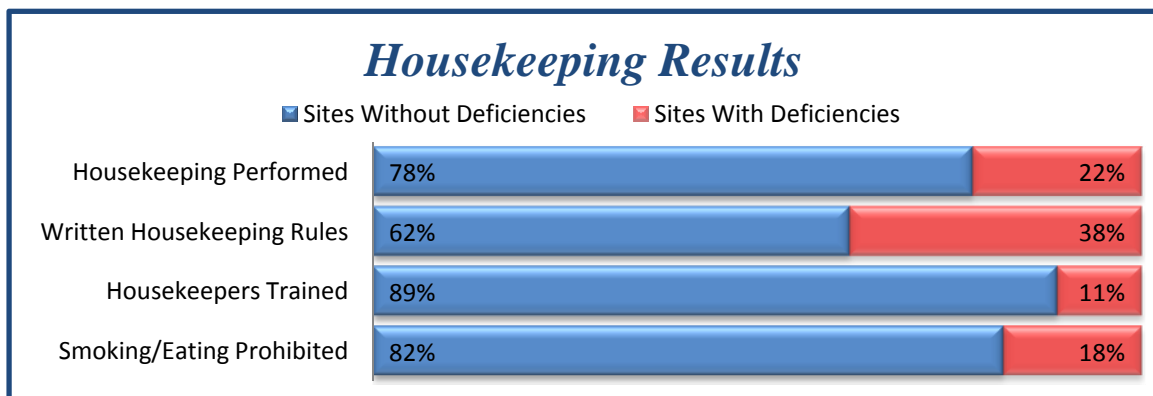
Security Results



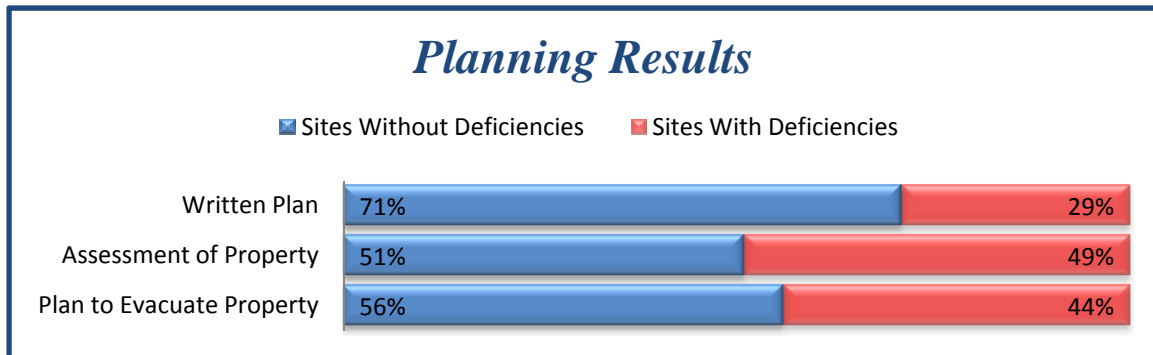
Fire Protection. Fire is one of the most likely disasters to occur and can cause the most devastating damage to museum property. Protecting museum property from fire involves both protecting the structure housing the collection and protecting the property itself. The three key elements of fire protection are: (1) prevention, (2) detection, and (3) suppression. To assess the adequacy of fire protection over museum collections, we evaluated 5 critical requirements for proper fire protection. The following is a break out of the results.



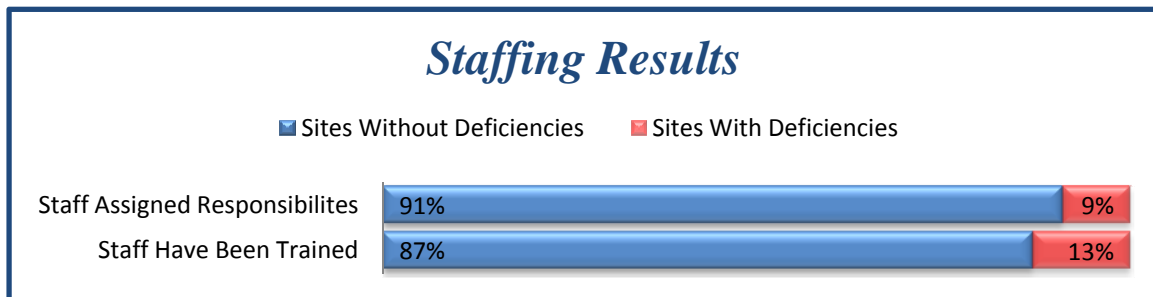
Housekeeping. Housekeeping encompasses tasks such as dusting, vacuuming, and applying protective waxes, as well as tasks such as changing filters in air handling units, monitoring pests through traps, and monitoring relative humidity. To assess the adequacy of museum collection housekeeping, we evaluated 4 critical requirements for proper housekeeping. The following is a break out of the results.



Planning. The preservation, protection, documentation, and management of museum property requires a program designed to provide appropriate long-term care for museum objects. Each bureau must ensure that planning standards are developed to maintain museum property. DOI has developed mandatory plans, reports, and procedures, and optional plans and procedures to facilitate appropriate museum property management. To assess the adequacy of museum collection planning, we evaluated 3 critical requirements for proper planning. The following is a break out of the results.



Staffing. Whether curatorial staff hold the title of museum curator or technician, property management specialist, or a person in another classification with collateral museum property duties, their duties relevant to museum property should be described in position descriptions and critical elements of performance standards. To assess the adequacy of museum staffing, we evaluated 2 critical requirements for proper staffing. The following is a break out of the results.



RECOMMENDATIONS FROM AUDIT

We recommend that the Assistant Secretary of Policy, Management and Budget:

1. Develop and implement a policy that provides for greater Department-level oversight of bureau museum programs to ensure that they comply with Department Manual requirements.
2. Revise DM 411 to require that bureaus comply with procedures established in the Museum Property Handbook, Volume II.
3. Develop and implement a comprehensive plan to be used by all bureaus to eliminate accessioning and cataloging backlogs so that all museum collections can be properly identified, tracked, and accounted for. The plan should identify the necessary resources, should consider some type of prioritization for more valuable objects, and address missing items.
4. Ensure that the Scope of Collection Statement of every site is reviewed and updated at least every 5 years, as required by Departmental Manual 411.
5. Ensure that required annual physical inventories are conducted at all DOI facilities that have museum collections and that appropriate steps are taken to address missing items.
6. Complete the department-wide implementation of ICMS to ensure uniform recordkeeping.
7. Reduce the number of facilities managing collections by consolidating collections at larger curation centers.
8. Pursue additional partnerships with interested organizations, such as universities, foundations, and other special interest groups, to aid in managing museum collections.
9. Increase effectiveness of control over museum collections held at non-DOI facilities by:
 - a. identifying all organizations that hold DOI collections,
 - b. identifying all objects held by those organizations, and
 - c. ensuring that annual physical inventories are conducted.

We recommend that the Assistant Secretary of Indian Affairs:

10. Issue a policy that clarifies the roles and responsibilities of the Division of Environmental and Cultural Resource Management (DECRM) and the Division of Property in the management of museum collections.

RECOMMENDATIONS FROM EVALUATION

We recommend that the Assistant Secretary of Policy, Management and Budget:

11. Revise Departmental Manual Part 411 to require bureaus comply with the preservation and protection procedures established in Volume I of the Museum Property Handbook.
12. Increase effectiveness of protection of collections held at DOI and non-DOI facilities by ensuring that annual physical inventories, which clearly identify the condition of museum property held, are conducted as required.
13. Direct all sites that have DOI property complete the comprehensive checklist included in Departmental Manual Part 411.

OBJECTIVE, SCOPE, METHODOLOGY, AND INTERNAL CONTROLS FOR AUDIT

Objective

Our objectives were to determine if DOI knew what artwork, artifacts, and other museum objects it owned and where the objects were located.

Scope

The scope of our audit included museum collections management at the Department level and at the bureau and field levels for NPS, BLM, FWS, BOR, and BIA. These five bureaus manage the majority of DOI's museum collections. We conducted our audit from August 2008 to April 2009.

Methodology

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based upon our audit objectives.

To accomplish the audit objectives, we:

- Included tests of records and other audit procedures that were considered necessary.
- Gained an understanding of DOI and the bureaus' museum programs.
- Interviewed DOI and bureau officials at the headquarters, regional, and field office levels.
- Visited selected bureau sites to identify museum collections accountability issues. We selected sites based on preliminary assessments of the number of items located at the site, coverage of all five bureaus and their regions, and multi-bureau sites at one location. Because we did not select a statistical sample of sites, the deficiencies we identified cannot be projected to the entire population of sites that hold museum collections. However, the results of our work at these sites, in conjunction with other evidence we gathered, support our conclusion that there are wide spread issues concerning accessioning, cataloging, and inventorying.
- Identified best practices within DOI and at non-federal repositories.

- Analyzed DOI and bureaus' management processes for identifying, accessioning, cataloging, and inventorying museum collections.
- Determined the effect of not identifying, accessioning, cataloging, and inventorying DOI museum collections.

Internal Controls

As part of the audit, we evaluated DOI and the bureaus' systems of internal controls related to processing and managing their museum collections.

This evaluation of internal controls was conducted at DOI and bureau offices to the extent we considered necessary to accomplish the audit objectives. We concluded that DOI and bureaus' museum programs lack adequate internal controls to identify and account for the millions of work of art, artifacts, and other museum objects under their control. These deficiencies are discussed in the audit results section of this report.

We reviewed DOI's "Performance and Accountability Reports" for FYs 2006 and 2007 and noted that no weaknesses were reported related to museum collections. No department-wide "Government Performance and Results Act" goals were found that related to the identification of or accountability for museum collections. BLM had one goal that related to the identification of or accountability for museum property.

Our recommendations, if implemented, should improve internal controls in the problem areas we identified.

OBJECTIVE, SCOPE, AND METHODOLOGY FOR EVALUATION

Objective

Our objective was to determine if DOI was adequately preserving and protecting its artwork, artifacts, and other museum objects.

Scope

The scope of our evaluation covered preservation and protection of museum collections at the Department level and at the bureau and field levels for BIA, BLM, BOR, FWS, and NPS. These five bureaus manage the majority of DOI's museum collections. Our scope also included protection and preservation of DOI museum collections maintained by non-DOI repositories.

Methodology

We conducted this evaluation in accordance with standards established by the President's Council on Integrity and Efficiency (PCIE), effective January 2005. To accomplish the evaluation objective, we:

- Reviewed DOI policies, procedures and handbooks to gain an understanding of DOI and the bureaus' museum programs.
- Interviewed appropriate DOI and bureau officials at the headquarters, regional, and field office levels. We also interviewed officials at non-DOI repositories visited.
- Developed a preservation checklist that contained 44 questions related to seven categories of preservation and protection of museum collections. These categories included storage, environment, security, fire protection, housekeeping, planning and staffing. To develop the checklist, we reviewed DOI's checklist and selected significant questions that addressed the seven categories. The checklist is based on preservation requirements outlined in the Departmental Manual and Handbook.
- Visited selected bureau sites and non-DOI repositories to identify museum protection and preservation issues. We selected sites based on assessments of the location of DOI and non-DOI repositories, coverage of all five bureaus and their regions, and multi-bureau sites at one location. While at each site, we completed an OIG preservation checklist.
- Requested that all 28 sites visited during our audit complete and return the preservation checklist. During the previous audit, we noted our physical observations of the sites, but did not complete a formal checklist. For the 23 sites that responded, we compared the self-reported deficiencies on the preservation checklist against our physical observations during the audit. Based on this comparison, we revisited three sites where the sites' self-reported deficiencies did not reflect our physical observations. At each site revisited, we completed the OIG preservation checklist. For our analysis, we used our observations at the three sites visited. For the remaining 20 sites that responded, we used responses to the checklist provided by the site.
- In addition to the checklist, we asked all of the sites to provide us copies of certain mandatory and optional documents described in the Museum Handbook that are intended to assist sites in the preservation of their collections. These included the Checklist Report, Basic Security Protection Report, Fire Protection Plan, Integrated Pest Management Plan, Environmental Control Plan, Annual Emergency Management Plan, Current Collection Storage Plan, and Written Handling Procedures.
- Identified, when applicable, preservation best practices at DOI and non-DOI sites visited.
- Analyzed DOI and bureaus' management processes for preserving and protecting museum collections.

RELATED REPORTS

National Academy of Public Administration Report

“Saving Our History: A Review of National Park Cultural Resource Program,” October 2008

Cultural resources, including resources of national significance, are at risk throughout the national park system. NPS is failing to fulfill its public trust for museum collections because 45 percent of its collections are not cataloged. There is also a lack of access to the NPS’ collections by researchers and the public. The panel made 18 recommendations in their review of the Cultural Resources Program.

OIG Audit Report No. Y-EV-NPS-0004-2008

“History Collection in Jeopardy at Harpers Ferry Center,” July 2008

Harpers Ferry Center does not know what it has or where to find items that are cataloged. The Center lacks adequate documentation for cataloged records to document NPS’ ownership of items. Records lack sufficient information to even locate the cataloged items.

US Army Corp of Engineers Report

“An Assessment of Museum Property at Select National Wildlife Refuges for the U.S. Fish and Wildlife Service,” May 2007

FWS, at select sites, did not 1) have a scope of collections plan at either the regional or refuge level and 2) inventory or catalog the objects and records to a standard consistent with those of a professional museum.

OIG Advisory Report No. 2003-I-0013

“Yosemite National Park’s Museum Operations, National Park Service,” March 2003

Yosemite had not conducted the required annual physical inventories since 1993 and did not know the size or condition of its museum collections.

OIG Audit Report No. W-VS-NPS-0002-2007

“Verification Review of Recommendations from our March 2003 Advisory Report No. 2003-I-0013, Yosemite National Park’s Museum Operations, National Park Service,” March 20, 2007

Yosemite had resolved all of the recommendations from Advisory Report No. 2003-I-0013, related to the museum collection.

OIG Audit Report No. 99-I-808

“Cultural Resource Management, Bureau of Land Management,” September 1999

BLM did not adequately control and account for its museum collections. The ownership of artifacts and historical items was not determined, newly collected objects were not timely deposited within repositories, required inventories were not completed, and collection agreements were not established with non-federal repositories.

OIG Audit Report No. 96-I-1245

“Follow-up of Recommendations Concerning Bureau of Indian Affairs’ Accountability and Control over Artwork and Artifacts Located in the Main and South Interior Buildings,”

September 1996

This OIG report is a follow-up of Audit Report No. 91-I-73. BIA had not conducted physical inventories of all artwork and artifacts. The inventory listings and property records were still inaccurate and incomplete. BIA still did not complete and file property receipts for all property in private offices.

OIG Audit Report No. 91-I-73

“Bureau of Indian Affairs Accountability and Control over Artwork and Artifacts Located in the Main and South Interior Buildings,” October 1990

BIA was not 1) maintaining adequate accountability, control, or storage of artwork and artifacts within the Main and South DOI Buildings in Washington, DC; 2) conducting physical inventories of all artwork and artifacts; and 3) issuing property receipts to assign responsibility for property in private offices.

OIG Audit Report No. 90-83

“Accountability and Control Over Artwork and Artifacts – Department of the Interior,” July 1990.

DOI did not maintain adequate accountability and control over artwork and artifacts. Bureaus did not always perform physical inventories; reconcile inventory results with property records; and investigate missing, stolen, damaged or destroyed property. The Department also did not have detailed procedures for accessioning and cataloging property. Additionally, artwork and artifacts were not effectively safeguarded from theft, fire, and environmental hazards.

GAO Audit Report No. RCED-88-3

“Cultural Resources, Problems Protecting and Preserving Federal Archeological Resources,” December 1987

Federal agencies did not have complete and accurate records on what artifacts have been removed from their lands or where these artifacts are located.

SITES VISITED DURING AUDIT

DOI Sites Visited

Acadia National Park (NPS) – Bar Harbor, ME*
 Alaska Native Claims Settlement Act Office (BIA) - Anchorage, AK*
 Alaska Regional Curatorial Center (NPS) - Anchorage, AK*
 Alaska Regional Office (FWS) - Anchorage, AK
 Anasazi Heritage Center (BLM) - Delores, CO*
 Area Archeology Anchorage Field Office (BIA) – Anchorage, AK
 Billings Curation Center (BLM) - Billings, MT*
 Boston National Historical Park (NPS) - Boston, MA
 Bureau Headquarters (BIA) – Herndon, VA
 Central Region Office (BIA) - Washington, DC
 D.C. Booth Historic National Fish Hatchery (FWS) - Spearfish, SD*
 Fort Union Trading Post National Historic Site (NPS) - Williston, ND*
 Fort Vancouver National Historic Site (NPS) - Vancouver, WA*
 Golden Gate National Recreational Area (NPS) - San Francisco, CA*
 Hoover Dam Repository (BOR) - Boulder City, NV*
 Huhugam Heritage Center (BOR) - Chandler, AZ*
 Kenai National Wildlife Refuge (FWS) - Soldotna, AK*
 Lewis and Clark National Historical Park (NPS) - Astoria, OR*
 Lower Colorado Regional Office (BOR) - Boulder City, NV*
 New Melones Artifact Storage Facility (BLM) – Jamestown, CA
 Portland Regional Office (FWS) - Sherwood, OR*
 Rocky Mountain Regional Office (BIA) - Billings, MT*
 Sherman Indian School Museum (BIA) - Riverside, CA
 South Florida Collections Management Center (NPS) - Homestead, FL*
 Southern California Agency Office (BIA) - Riverside, CA
 Southern Plains Regional Office (BIA) – Anadarko, OK*
 Western Archaeological and Conservation Center (NPS) – Tucson, AZ*
 Western Regional Office (BIA) – Phoenix, AZ*

* These sites provided a self-reported checklist, which were used during the Preservation Evaluation.

non-DOI Sites Visited

Denver Museum of Nature and Science - Denver, CO***
 University of Colorado Museum of Natural History - Boulder, CO***
 University of Denver Museum of Anthropology - Denver, CO***

*** These sites were visited during both the audit and the evaluation.

SITES VISITED DURING EVALUATION

DOI Sites Visited

Arlington House (NPS) – Arlington, VA
 Boston National Historical Park (NPS) - Charlestown, MA**
 Central Office West (BIA) - Albuquerque, NM
 Central Region Office (BIA) - Washington, DC**
 Fort Union National Monument (NPS) - Watrous, NM
 Great Falls Park (NPS) - McLean, VA
 Hagerman Fossil Beds National Monument (NPS) - Hagerman, ID
 Mason Neck National Wildlife Refuge (FWS) - Woodbridge, VA
 Middle Snake River Field Office (BOR) - Boise, ID
 Minidoka Internment National Monument (NPS) - Hagerman, ID
 National Historic Oregon Trail Interpretive Center (BLM) - Baker City, OR
 New Melones Artifact Storage Facility (BOR) - Jamestown, CA**
 Northeast Museum Services Center (NPS) - Boston, MA
 Northern California Agency (BIA) - Redding, CA
 Parker River National Wildlife Refuge (FWS) - Newburyport, MA
 Patuxent Research Refuge (FWS) - Laurel, MD
 Petroglyph National Monument (NPS) - Albuquerque, NM
 Rocky Mountain Arsenal National Wildlife Refuge (FWS) – Commerce City, CO
 Whiskeytown National Recreation Area (NPS) - Whiskeytown, CA

** These sites provided a self-reported checklist that materially differed from our physical observations at these sites during our audit. We chose to revisit the sites during our preservation evaluation and complete the checklist ourselves. For our preservation evaluation we used the checklist that we prepared rather than the self-reported information.

non-DOI Sites Visited

Denver Museum of Nature and Science - Denver, CO***
 Museum of New Mexico, Indian Arts & Culture, Laboratory of Anthropology – Santa Fe, NM
 Museum of New Mexico Maxwell Museum of Anthropology - Albuquerque, NM
 New Mexico Museum of Natural History and Science - Albuquerque, NM
 University of Colorado Museum of Natural History - Boulder, CO***
 University of Denver Museum of Anthropology - Denver, CO***

*** These sites were visited during both the audit and the evaluation.

ABBREVIATIONS & ACRONYMS

ANCSA	Alaska Native Claims Settlement Act
BIA	Bureau of Indian Affairs
BLM	Bureau of Land Management
BOR	Bureau of Reclamation
DECRM	Division of Environmental and Cultural Resource Management
DM	Departmental Manual
DOI	Department of the Interior
FWS	Fish and Wildlife Service
GAO	Government Accountability Office
ICMS	Interior Collection Management System
IMPC	Interior Museum Property Committee
NPS	National Park Service
OIG	Office of Inspector General
PAM	Office of Acquisition and Property Management

SCOPE OF COLLECTIONS

No Scope of Collections

Bureau of Indian Affairs

Rocky Mountain Regional Office, Billings, MT
Southern Plains Regional Office, Anadarko, OK

National Park Service

Alaska Region Curatorial Center, Anchorage, AK

Outdated Scope of Collections

Bureau of Land Management

Anasazi Heritage Center, Dolores, CO

Bureau of Reclamation

Hoover Dam Repository, Boulder City, NV

Fish and Wildlife Service

Kenai National Wildlife Refuge, Soldotna, AK
Portland Regional Office, Sherwood, OR

National Park Service

Western Archaeological and Conservation Center, Tucson, AZ
Golden Gate National Recreation Area, San Francisco, CA
Boston National Historical Park, Boston, MA
Lewis and Clark National Historical Park, Astoria, OR

CHALLENGES REGARDING COLLECTIONS

In its “FY2007 Museum Collections Management Report,” BLM identifies the following challenges regarding its collections stored at non-DOI facilities:

- **Locating Collections:** It must locate “permitted” and “legacy”¹¹ collections held by non-federal facilities. Because of poor historical documentation on these collections, it must first identify facilities that potentially hold objects originating from BLM lands and then rely on those facilities to conduct inventories to determine the presence, content, and condition of collections.
- **Determining Ownership:** It is often difficult to determine ownership of collections because the necessary documentation is not adequate to determine whether the collections came from BLM lands.
- **Requesting Inventory Data:** The ability to request information and conduct inventory reviews is limited because these facilities have received little or no BLM funding. Efforts to obtain detailed information from non-federal facilities concerning BLM collections can antagonize the facilities that have curated these collections for decades without BLM support.
- **Fees:** Some facilities have closed to new collections, while others are increasing fees to match the escalating costs associated with managing these collections. BLM cites that some facilities increased the fee from \$250 to \$2,600 per cubic foot.

¹¹ Permitted collections contain objects collected after BLM was delegated permitting authority in 1984 by Secretarial Order 3104. Legacy collections contain objects collected by organizations prior to this 1984 delegation.

DEPARTMENT COMMENTS AND OIG RESPONSES

Department Comment Synopsis	OIG Response
General Comments	
<p>DOI stated that the report did not describe significant stewardship gains since 1990. These include the development of guidance for the bureaus and numerous initiatives to track and monitor bureau programs such as completion of annual museum summary reports, completion of two targeted management control reviews of museum property collections, and development of the ICMS. DOI stated that it was misleading to say that it had shown little interest in documenting its museum collections</p>	<p>We deleted the statement that DOI has shown little interest in the program. However, we stand by our overall conclusions on DOI's museum program. We found widespread issues with accessioning, cataloging, and inventorying of museum collections. While there is ample guidance on managing museum collections, bureaus are simply not following that guidance. Numerous sites we visited failed to conduct required annual inventories. Additionally, over 50 percent of museum objects are not yet cataloged and DOI estimates that full cataloging will not be completed for at least another 20 years.</p>
<p>DOI stated that although the report discussed the lack of both funding and qualified staff, the recommendations do not explicitly address these deficiencies or the lack of congruence between currently allocated resource levels and the scope of the bureau legal responsibilities for stewardship of museum collections.</p>	<p>We do not include a recommendation to adequately fund the museum programs. However, we do recommend that DOI develop and implement a plan to eliminate the accessioning and cataloging backlogs. Inherent in that process is identifying and allocating the appropriate resources to implement the plan – either through allocation of discretionary funding or through specific funding requests to the Congress.</p>
Accountability Over Museum Collections	
<p>DOI requested additional information on our sampling strategy and expressed concern on our ability to draw conclusions that are representative of all sites based on our sample of sites.</p>	<p>We revised the report to provide additional information on our sampling strategy.</p>
<p>The draft states that no SOC exists for the Alaska Region Curatorial Center (ARCC). While the Center does not have a formal SOC, the scope of collection is described in other management documents.</p>	<p>We were informed by the ARCC that they include there scope of collection in their Collection Management Policy. However, review of the policy disclosed that the section labeled "Scope of Collection" did not include required elements. Therefore, we concluded that this was not a Scope of Collection.</p>

DOI stated our assertion that NPS did not have complete lists of all non-DOI facilities that held their museum collections was misleading. While NPS could not provide a current consolidated and comprehensive list of these institutions on short notice, the data exists at the individual parks. While some facilities are not yet identified on the consolidated NPS list being compiled, in most cases, they are known by the collection management staffs in individual parks.	Our statement that NPS does not have a complete list of non-DOI facilities holding its collections is true. While DOI's response suggests that most of the non-DOI facilities would be known by the individual parks, it did not provide evidence to show that this is true. In fact, NPS' own Park Collection Museum Storage Plan, dated March 2007, states that not all non-DOI institutions that curate NPS' natural history collection have been identified and the size of those collections had not been completely verified in some cases.
Program Management	
DOI requested more explicit guidance concerning desired changes in management reports. 411 DM describes the format of the required reports including information on funding, staffing, accomplishments, hindrances, program history, and best available numbers on cataloged and uncataloged collections. DOI requested specific changes that OIG desired in the information presented in its reports.	Our concerns with DOI's management reports were primarily related to the quality and accuracy of the data presented in the reports, rather than the specific format or categories of information presented.
DOI stated that individual bureaus are responsible for the museum property under their control and the actual management of resources under their jurisdiction. PAM does not directly manage any resource program but rather has an oversight, assistance, and coordination function. PAM does have policy oversight for museum property within the Department.	Ultimately, the bureaus are responsible for managing their museum collections. However, PAM has responsibility for establishing the standards and providing oversight to the bureaus. Our recommendations are directed to PAM in its oversight role – to ensure that the bureaus are implementing the program in compliance with PAM's established standards.
DOI stated that our draft report did not accurately describe the role of the Interior Museum Property Committee (IMPC). The draft report stated that the IMPC does not have any oversight responsibilities, but instead, was established to assist PAM in implementing the requirements of 411 DM and to provide a forum for sharing information among bureaus.	The IMPC does not have a charter and there is no documentation that describes the purpose and responsibilities of the IMPC. Based on review of meeting notes, we concluded that the IMPC was intended to provide an oversight function. However, we agree with the Department that under 411 DM, PAM has ultimate responsibility for providing oversight to the bureaus for the museum programs. We therefore deleted references to the IMPC in the report.

Recommendation 1	
<p>The Department did not concur with our draft report recommendation that called for “improving DOI’s Cultural Resources Program by developing a mission with clear objectives and establishing greater Department oversight of bureau programs.” The Department stated that the recommendation should address the Museum Program, rather than “the Cultural Resources Program” and that DM 411 clearly identifies the Museum Program’s mission and objectives. The Department also stated that it had done some oversight of bureau museum programs through review of required annual reports; however, additional oversight was hindered due to staffing shortages. Staff have now been hired to oversight the programs.</p>	<p>Based on the Department’s response, we revised our recommendation to focus on Departmental oversight of the bureau museum programs. We agree that DM 411 adequately describes the mission of the museum programs; however, we found that bureaus are not accomplishing that mission because they are not following the requirements of DM 411 and the guidance in the Museum Handbook. The Department’s response indicates that additional staff have been hired to provide oversight to the bureau programs, but does not provide specifics on the oversight activities that these staff will conduct.</p>
Recommendation 2	
<p>This recommendation was not included in our draft report. In its response to the draft report, the Department noted that bureaus are not required to follow the guidance in the Museum Property Handbook. The Handbook is supplemental technical guidance offering advice and information. While such handbooks are typically considered part of the applicable DM section, in this case, 411 DM specifically states that the handbook adds no additional mandates to those found in 411 DM.</p>	<p>411 DM provides only high level standards and requirements for the Museum Program, not the detailed procedures necessary to implement those standards and requirements. Those detailed procedures are included in the related Museum Property Handbook. However, the bureaus are not required to comply with this guidance. The result is wide inconsistencies between procedures used at the 625 Department facilities that house collection. Therefore, we have added this recommendation to strengthen the bureau museum programs.</p>
Recommendation 3	
<p>The Department concurred and stated that Interior Museum Program staff will partner with bureau representative to develop a strategy to eliminate backlogs. The department explained that bureaus established plans in the mid 1990’s that called for cataloging to be completed by the year 2030. Based on current backlogs and the available resources, however, actual completion will take much longer unless resource levels are increased to match the scope of the challenge.</p>	<p>While we agree that development of the plan is a necessary first step, continuing on the current path until beyond 2030 (more than 20 years) is unacceptable. Innumerable irreplaceable museum items could be lost in the next 20 years. We urge the Department to develop a more aggressive plan to address the accessioning and cataloging backlog and to allocate the necessary funding to implement the plan. To reduce the funding required, the plans could incorporate less costly alternatives including consolidation of facilities and use of volunteers as separately recommended.</p>

Recommendation 4	
The Department did not concur with our draft report recommendation which called for updates to the Scope of Collection Statements every 2 years as recommended by the Department's Museum Property Handbook. The Department stated that the value of such frequent updates is questionable and suggested that our recommendation should instead refer to the Departmental Manual requirement that updates occur a minimum of every 5 years.	Based on the Department's response, we revised our report to identify the sites that had not updated their SOC within the 5 years and revised our recommendation to match the requirements of 411 DM.
Recommendation 5	
The Department concurred, although it stated that the ability to conduct physical inventories has been restricted due to insufficiently staffed bureau museum program infrastructures and insufficient coordination among bureau personal property management programs.	Although the Department concurred with the recommendation, it did not provide a plan for how it will implement the recommendation.
Recommendation 6	
The Department concurred, stating that ICMS has been installed and is currently being implemented at BIA, FWS, NPS, Indian Arts and Crafts Board, U.S. Geological Survey, National Business Center, and Minerals Management Service. ICMS was to be installed at BOR in July 2009 and at BLM in August 2009. The Office of Special Trustee for American Indians had not committed to a date for installing the new collections management software.	We consider this recommendation resolved but not completely implemented.
Recommendation 7	
The Department partially concurred, stating that such centers create economies of scale and one standard of care with the potential for cost savings. Careful planning will be required to ensure access by the public, to negotiate inter-bureau and inter-agency partnerships, and to identify resources to establish or expand consolidated curation centers.	Although the Department partially concurred with the recommendation, it did not provide information on the actions it plans to take to address the recommendation.

Recommendation 8	
The Department partially concurred, stating that the Department and its bureaus cannot relinquish ownership responsibility for museum property or delegate core fiduciary responsibilities for the collections when they enter into partnerships. It is not appropriate for private institutions to assume financial responsibility for publicly owned museum collections.	Although the Department partially concurred with the recommendation, it did not provide information on the actions it plans to take to address the recommendation. We agree that when developing its partnerships, the Department and its bureaus should not relinquish its ownership, fiduciary, and financial responsibilities. As we described in our report; however, several sites have already established partnerships with organizations such as colleges and universities. These efforts should be expanded where possible.
Recommendation 9	
The Department concurred, stating that for decades, DOI and other Federal agencies have partnered with non-Federal institutions to care for Federal museum collections. These repositories are dedicated to the management of museum collections, while Federal organizations are not. Care must be taken; however, to ensure that partnerships are adequately funded, so they do not require bureaus to duplicate the curation work performed by non-Federal professionals. Oversight of Federal resources is an important responsibility, but such efforts should not duplicate the curatorial efforts of non-Federal repositories	Although the Department concurred with the recommendation, it did not provide information on the actions it plans to take to address the recommendation.
Recommendation 10	
The Assistant Secretary, Indian Affairs concurred with this recommendation. The Indian Affairs' DECRM and the Property Division will collaborate to assess the museum collection management processes and determine the appropriate roles and responsibilities to improve Indian Affairs' accountability for the museum collections. Discussions are planned to begin in the summer of 2009. Once a determination is made, Indian Affairs will issue formal policy at the national level. The policy is planned to be in place by early FY 2010.	We consider this recommendation resolved but not implemented.

STATUS OF RECOMMENDATIONS

Recommendations	Status	Action Required
1, 4	Unresolved Management did not concur, recommendation revised	The Department should state concurrence or nonconcurrence with the revised recommendation and provide information on actions taken or planned, including target dates and titles of officials responsible for implementation.
3, 5, 7, 8, 9	Unresolved Management concurred/partially concurred; additional information needed	The Department should provide additional information on actions taken or planned, including target dates and titles of officials responsible for implementation.
2	Unresolved New recommendation	The Department should state concurrence or nonconcurrence with the new recommendation and provide information on actions taken or planned, including target dates and titles of officials responsible for implementation.
6, 10	Resolved, but not implemented.	No further response to the Office of Inspector General is needed. We will refer the recommendation to the Assistant Secretary for Policy, Management and Budget for tracking of implementation.
11, 12, 13	Unresolved	These recommendations are related to the evaluation and were not included in the audit report the Department responded to.

PRESERVATION AND PROTECTION CHECKLIST

STORAGE

1. The space is in an area that will not flood if pipes break, drains back up, or roofs leak.
2. The space is appropriately insulated to help maintain stable environmental conditions.
3. Space is sufficient (e.g., low ceilings; inadequately sized doors; or narrow, winding, or steep stairways) and organized (e.g., boxes or items cannot be easily accessed) in a way to allow for the movement of staff, equipment, and objects in and out without hindrances.
4. Space is large enough to accommodate the current museum property and any anticipated growth.
5. Storage cabinets are in good condition (e.g., are free of rust, have gaskets intact to provide good sealing action, have smoothly operating doors) and have working keyed or combination lock mechanisms.
6. Storage cabinets are not stacked more than two high.
7. Open shelving is free of burrs, splinters, exposed nails, screws, and bolts that can damage museum materials and stabilized to prevent it from tipping over.
8. Museum property that is stacked is protected by appropriate containers or cushioning materials.
9. If the unit is in an earthquake-prone area, restraining bars or elastic cords are attached to edges of shelves to prevent objects from falling off shelves during an earthquake.
10. Items are safe guarded against overcrowding, breakage, or cross-contamination.
11. Exhibit cases are designed and fabricated in a manner that ensures the security and preservation of museum property (i.e., minimizes heat buildup; controls light, relative humidity, and dust levels; and prevents access by insects).
12. Exhibit cases are designed and fabricated in a manner that facilitates maintenance (i.e., ease of access for inspection, inventory, cleaning, and rotation of sensitive materials).
13. Artwork is properly framed and is securely hung on the wall and artifacts are properly displayed.

ENVIRONMENT

14. Levels of relative humidity and temperature in storage and exhibit spaces are monitored on a daily basis to provide an accurate and complete picture of all changes in both of these environmental factors during each year and monitoring equipment is calibrated quarterly.
15. A record of daily observations, noting occurrences such as unusual exterior climatic conditions, a leaky roof, re-calibration of equipment, or an unusual visitation pattern, is maintained to help explain any variations in relative humidity and temperature readings.
16. Records of relative humidity and temperature readings and of daily observations are permanently retained in the unit's files.
17. Records of relative humidity and temperature readings and of daily observations are reviewed and analyzed monthly to determine relative humidity and temperature highs, lows, means, and the frequency and extent of fluctuations.
18. If a hygrothermograph is used to monitor relative humidity and temperature, it is regularly maintained (e.g., linkage is cleaned and ink is replenished).
19. If space has windows, light is appropriately controlled for museum property.

20. The placement of artwork is away from heating and air-conditioning vents.
21. Pest control devices are located in the artwork and artifact storage and exhibit areas.
22. The contents of the pest control devices are recorded, maintained, and analyzed if needed.
SECURITY
23. Keys to storage spaces and exhibit cases are issued only to those employees having direct responsibility for museum property.
24. Issuing of keys to museum storage spaces and exhibit cases is strictly controlled by the use of signed hand receipts.
25. All researchers, visitors, and non-curatorial staff who enter the storage area are escorted at all times by unit staff.
26. A visitor/researcher sign-in log is used to record names and addresses of visitors, the date of visit, the time entered and departed, and the reason for the visit.
27. Opening and closing procedures for museum spaces housing museum property are written, approved, and practiced.
28. Installed intrusion alarm systems are inspected and maintained on a regular schedule to ensure that they are fully operational.
29. Small, highly sensitive, and valuable museum materials, and natural history type specimens housed in museum storage spaces, are kept in cabinets with keyed or combination locks.
30. Irreplaceable, particularly sensitive, and valuable museum property used in exhibits is protected in cases or by other means that provide protection from theft or vandalism without making access impractical.
FIRE PROTECTION
31. Fire detection and suppression systems are inspected and maintained on a regular schedule to ensure that they are fully operational.
32. Fire extinguishers are inspected annually to ensure that they are operational.
33. Staff are trained in the use of fire extinguishers.
34. Museum property on top of shelving or storage cabinets does not obstruct the discharge heads for fire suppression systems.
35. Flammable liquids and materials are housed outside museum storage spaces and, regardless of where stored, such materials are housed in approved flammable storage cabinets with proper ventilation.
HOUSEKEEPING
36. Housekeeping in museum property spaces is performed according to an established schedule.
37. Unit-specific general rules and procedures are written to provide guidance on handling and housekeeping.
38. Handling and dusting of museum property is performed only by staff who have received appropriate training.
39. Smoking, drinking, and eating in museum storage and exhibit spaces are prohibited in writing.
PLANNING
40. The unit has an approved plan for managing and preserving museum property. (If yes, indicate the title and approval date under comment.)
41. The unit has an assessment of the condition of museum property on exhibit and in storage, and guidance on setting priorities for conservation treatment.
42. There are instructions that provide guidance for the safe and secure evacuation of artwork and artifacts.

STAFFING

43. Unit staff have been assigned curatorial responsibilities to ensure the preservation and protection of museum property.

44. Unit staff have received training in the preservation and protection of museum property.

ADDITIONAL DOCUMENTS

1. Checklist Report

2. Basic Security Protection Report

3. Fire Protection Plan

4. Integrated Pest Management Plan

5. Environmental Control Plan

6. Annual Emergency Management Plan

7. Current Collection Storage Plan

8. Written Handling Procedures

Report Fraud, Waste, Abuse

And Mismanagement



Fraud, waste, and abuse in government concerns everyone: Office of Inspector General staff, Departmental employees, and the general public. We actively solicit allegations of any inefficient and wasteful practices, fraud, and abuse related to Departmental or Insular area programs and operations. You can report allegations to us in several ways.



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